

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
BOY SCOUTS OF AMERICA AND)	Case No. 20-10343 (LSS)
DELAWARE BSA, LLC, ¹)	
)	(Jointly Administered)
Debtors.)	
)	
)	
)	

NOTICE OF REQUEST TO PRESENT AT OMNIBUS HEARING

Babin Law, LLC (“Babin Law”), on behalf of two of its clients, SST-902574 and SST-907529 (collectively, the “Claimants”), by and through undersigned counsel, hereby requests this Honorable Court allot Babin Law a brief period of time to present during the Omnibus Hearing on November 20, 2023. (D.I. 11585)

On October 31, 2023, Babin Law filed a Motion To Change Election To Opt Into Expedited Payment/Convenience Class (the “Motion”) on behalf of its Claimants. (D.I. 11567). Several similar Motions regarding Expedited Distribution Elections were filed before and after Babin Law’s Motion. This Court subsequently set an omnibus hearing date on Babin Law’s and other motions for November 20, 2023. (D.I. 11585) The Settlement Trustee filed a Motion in opposition to Babin Law’s Motion on November 10, 2023. (D.I. 11602).

While some issues outlined in the motions overlap, others are distinct and unique to each Claimant. Specifically, Babin Law’s Motion argues the Claimants’ ballots electing the Expedited

¹ The Debtors in these Chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

Distribution were previously invalidated, and thus, should be withdrawn. As such, Babin Law would like to request this Court allocate time for Babin Law to address the unique issues presented in its Motion. Babin Law has conferred and will continue to confer with other counsel and will rely on others to argue issues that overlap. Babin Law only seeks to argue discreet issues that exist regarding Claimants SST-902574 and SST-907529.

Date: November 13, 2023

BY: /s/ David Crumplar

David Crumplar (#5876)
Jacobs & Crumplar, P.A.
750 Shipyard Dr., Suite 200
Wilmington, DE 19801
Phone: (302) 656-5445
Email: Davy@jcdelaw.com

Kristina Aiad-Toss (0101336)
Babin Law, LLC
65 E. State St. Suite 1300
Columbus, OH 43215
Ph: (614)-982-0067
Kristina.aiad-toss@babinlaws.com

CERTIFICATE OF SERVICE

I, David T. Crumplar, hereby certify that, on this 13th day of November, 2023, and in addition to the service provided under the Court's CM/ECF system, I caused copies of the foregoing *Notice Of Request To Present At Omnibus Hearing* to be served upon the parties listed on the attached service list by email.

/s/ David Crumplar

David Crumplar (#5876)
Jacobs & Crumplar, P.A.
750 Shipyard Dr., Suite 200
Wilmington, DE 19801
Phone: (302) 656-5445
Email: Davy@jcdelaw.com

SERVICE LIST

Derek C. Abbott, Esquire Andrew R. Remming,
Esquire Paige N. Topper, Esquire MORRIS,
NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
dabbott@morrisnichols.com
aremming@morrisnichols.com
ptopper@morrisnichols.com

Glenn Kurtz, Esquire

Jessica C. Lauria, Esquire

Andrew Hammond, Esquire

Samuel P. Hershey, Esquire

WHITE & CASE LLP

1221 Avenue of the Americas New
York, New York 10020

gakurtz@whitecase.com

jessica.lauria@whitecase.com

ahammond@whitecase.com

sam.hershey@whitecase.com

Richard M. Pachulski, Esquire

James E. O'Neill, Esquire

PACHULSKI STANG STANG ZIEHL & JONES
LLP

919 North Market Street, 17th Floor Wilmington, DE
19801

rpachulski@pszjlaw.com

joneill@pszjlaw.com

Office of The United States Trustee Attn: David
Buchbinder, Esquire

J. Caleb Boggs Federal Building 844 King Street,
Suite 2207

Lockbox 35

Wilmington, DE 19801

David.L.Buchbinder@usdoj.gov

Office of The United States Trustee
Attn: David Buchbinder, Esquire
J. Caleb Boggs Federal Building 844 King
Street, Suite 2207

Lockbox 35

Wilmington, DE 19801

David.L.Buchbinder@usdoj.gov

Michael C. Andolina, Esquire Matthew E.
Linder, Esquire Laura E. Baccash, Esquire
Blair M. Warner, Esquire WHITE & CASE
LLP

111 South Wacker Drive Chicago, Illinois

60606 mandolina@whitecase.com

mlinder@whitecase.com

laura.baccash@whitecase.comblair.warner@whitecase.com

Kurt F. Gwynne, Esquire Mark W.
Eckard, Esquire

REED SMITH LLP

1201 Market Street, Suite 1500

Wilmington, DE 19801

kgwynne@reedsmith.com

meckard@reedsmith.com

Thomas Moers Mayer, Esquire

Rachael Ringer, Esquire

Jennifer R. Sharret, Esquire

Megan M. Wasson, Esquire

KRAMER LEVIN NAFTALIS

& FRANKEL LLP

177 Avenue of the Americas

New York, NY 10036

tmayer@kramerlevin.com

rringer@kramerlevin.com

jsharret@kramerlevin.com

mwasson@kramerlevin.com